

**From:** [Nicholas Goodman](#)  
**To:** [Ahmad Keshavarz](#)  
**Cc:** [Patrick Selvey](#); [Judy Miller](#); [Farah Jean Francois](#)  
**Subject:** RE: CONFIDENTIAL PURSUANT TO MEDIATION AND FRE 408 Farah Jean Francois - Plaintiff's Mediation Statement and Settlement Demand  
**Sent:** 3/10/2025 12:27:55 PM

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Ahmad,

We are not going to refile our opposition brief. You are of course free to argue whatever you want in your reply brief.

Regards,

*H. Nicholas Goodman*

Nicholas Goodman & Associates, PLLC  
333 Park Avenue South, Suite 3A  
New York, N.Y. 10010  
Office Main (212) 227-9003  
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Thank you.

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**From:** Ahmad Keshavarz <[ahmad@newyorkconsumerattorney.com](mailto:ahmad@newyorkconsumerattorney.com)>  
**Sent:** Monday, March 10, 2025 12:07 PM  
**To:** Nicholas Goodman <[nicholas@ngoodmanlaw.com](mailto:nicholas@ngoodmanlaw.com)>  
**Cc:** Patrick Selvey <[patrick@ngoodmanlaw.com](mailto:patrick@ngoodmanlaw.com)>; Judy Miller <[judy@newyorkconsumerattorney.com](mailto:judy@newyorkconsumerattorney.com)>  
**Subject:** RE: CONFIDENTIAL PURSUANT TO MEDIATION AND FRE 408 Farah Jean Francois - Plaintiff's Mediation Statement and Settlement Demand

Hi Nick,

Just following up on this.

Please let me know.

Thanks



FDCPA Attorneys: Protecting consumers from deceptive and unfair debt collection

**The Law Office of Ahmad Keshavarz**

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**From:** Ahmad Keshavarz  
**Sent:** Saturday, March 8, 2025 12:32 PM  
**To:** Nicholas Goodman  
**Cc:** Patrick Selvey; Judy Miller  
**Subject:** FW: CONFIDENTIAL PURSUANT TO MEDIATION AND FRE 408 Farah Jean Francois - Plaintiff's Mediation Statement and Settlement Demand

Hi Nick,

Hope you are well.

I was going through Defendants' Fee Opposition and noted that page 12 fn. 6 seemed to be disclosing information in the mediation statement:

6. Indeed, Plaintiff stated her first demand, seeking a whopping \$720,000.00, on May 30, 2024, two weeks before the scheduled mediation.

While I won't respond to the accuracy of the number quoted, the only settlement demand we made on May 30, 2024 was conveyed solely through the attached confidential 28 page mediation statement. The document is designated throughout, such as in the footer on every page as, "CONFIDENTIAL MEDIATION STATEMENT: DESIGNATED CONFIDENTIAL UNDER MEDIATION PRIVILEGE AND FRE 408."

While the mediation statement may contain an opening bid for mediation, the fact of the matter is that the entire document, including the opening mediation bid is confidential.

I would ask that you refile the Opposition deleting that footnote.

Please let me know if you are or are not willing to delete the footnote voluntarily.

If you are then let's call the Court tomorrow for consent to refile without the footnote.

Thanks.



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**From:** Emma Caterine  
**Sent:** Thursday, May 30, 2024 10:16 AM  
**To:** Paul Radvany; Nicholas Goodman; Patrick Selvey  
**Cc:** Ahmad Keshavarz  
**Subject:** CONFIDENTIAL PURSUANT TO MEDIATION AND FRE 408 Farah Jean Francois - Plaintiff's Mediation Statement and Settlement Demand

Prof. Radvany and Counsel,

Please see attached for Plaintiff's Mediation Statement and Settlement Demand. We are sharing our analysis with Defendants as well as the Mediator to show all our cards and facilitate frank settlement conversations.

We ask counsel to please forward to your clients for discussion, and we look forward to the mediation.

Emma Caterine, Esq.  
Partner



FDCPA Attorneys: Protecting consumers from deceptive and unfair debt collection

**The Law Office of Ahmad Keshavarz**

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Email: [emma@newyorkconsumerattorney.com](mailto:emma@newyorkconsumerattorney.com)

**From:** Emma Caterine on behalf of [Emma Caterine](#)  
**To:** [Paul Radvany](#); [Nicholas Goodman](#); [Patrick Selvey](#);  
**Cc:** [Ahmad Keshavarz](#)  
**Subject:** CONFIDENTIAL PURSUANT TO MEDIATION AND FRE 408 Farah Jean Francois - Plaintiff's Mediation Statement and Settlement Demand  
**Attachments:** [2024-05-30 Mediation Letter to All Parties and Mediator.pdf](#)  
**Sent:** 5/30/2024 10:16:04 AM

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Prof. Radvany and Counsel,

Please see attached for Plaintiff's Mediation Statement and Settlement Demand. We are sharing our analysis with Defendants as well as the Mediator to show all our cards and facilitate frank settlement conversations.

We ask counsel to please forward to your clients for discussion, and we look forward to the mediation.

Emma Caterine, Esq.  
Partner



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**AHMAD KESHAVARZ**

*Attorney at Law*

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**CONFIDENTIAL MATERIAL FOR USE ONLY IN MEDIATION**

May 30, 2024

VIA email to [pradvanyadr@gmail.com](mailto:pradvanyadr@gmail.com)  
Professor Paul Radvany

Re: Plaintiff's Confidential Mediation Statement and Settlement Demand of

[REDACTED]  
*Francois v. Spartan Auto Group LLC, et al.*, Case 1:22-cv-4447-JSR.

Dear Prof. Radvany and All Counsel of Record:

**CONFIDENTIAL MEDIATION STATEMENT: DESIGNATED CONFIDENTIAL  
UNDER MEDIATION PRIVILEGE AND FRE 408**

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**CONFIDENTIAL MEDIATION STATEMENT: DESIGNATED CONFIDENTIAL  
UNDER MEDIATION PRIVILEGE AND FRE 408**

Last saved: 5/30/2024 10:13 AM



















Respectfully submitted,

/s/

Ahmad Keshavarz

cc: opposing counsels (via email)

















